



## U.S. Department of Justice

United States Attorney  
Southern District of New York

**MEMO ENDORSED**

The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

August 14, 2025

**BY ECF**

The Honorable Jessica G. L. Clarke  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Peraire-Bueno*, S1 24 Cr. 293 (JGLC)**

Dear Judge Clarke:

The Government respectfully submits this letter on behalf of the parties to propose modifications to certain pre-trial deadlines outlined in the Court's September 25, 2024 scheduling order, as amended by the Court's recent order directing the defendants to provide expert disclosures by August 13, 2025. (*See* Dkts. 46, 119).

On August 13, 2025, the defendants provided the Government with four expert disclosures in accord with the Court's order. The parties have conferred and jointly propose the following modifications for the Court's approval:

	Current Deadline	Proposed Deadline
Parties to file <i>Daubert</i> motions	August 22, 2025	<b>September 10, 2025</b>
Parties to submit joint proposed <i>voir dire</i> , requests to charge, verdict sheet, and optional pretrial memorandum of law	September 8, 2025	<b>September 15, 2025</b>
Parties to file oppositions to <i>Daubert</i> motions	September 8, 2025	<b>September 24, 2025</b>

Finally, the parties have conferred, but are unable to reach agreement, regarding a date for the Government to provide rebuttal expert disclosures, if any. Thus, the parties jointly and respectfully request that the Court permit the Government and defendants to file letter briefs by **Monday, August 18, 2025**, not to exceed two single-spaced pages (excluding exhibits), outlining their respective positions regarding the Government's rebuttal expert disclosure date.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

by:                     /s/                      
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Assistant United States Attorneys  
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Cc: Counsel of Record (by ECF)

The parties are directed to file letter briefs, regarding a date for the Government to provide rebuttal expert disclosures, by **Monday, August 18, 2025**. After reviewing the parties' submissions, the Court will issue an order regarding all deadlines at issue in ECF No. 120.

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke". The signature is written in a cursive, flowing style.

JESSICA G. L. CLARKE  
United States District Judge

Dated: August 14, 2025  
New York, New York